

**EXHIBIT A**

**Proposed Order**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re:	:	Chapter 15
ALITALIA – SOCIETÀ AEREA ITALIANA S.P.A.	:	
IN AMMINISTRAZIONE STRAORDINARIA	:	Case No. 17-11618-SHL
	:	
Debtor in a Foreign Proceeding.	:	
	:	
-----X	:	

**ORDER GRANTING APPLICATION FOR SUBSTITUTION  
OF FOREIGN REPRESENTATIVE**

Upon the *Application for Substitution of Foreign Representative* (Docket No. \_\_) (the “Application”), dated April 4, 2019, of Prof. Enrico Laghi, in his capacity as a duly authorized foreign representative and extraordinary commissioner of Alitalia – Società Aerea Italiana S.p.A. in Amministrazione Straordinaria (“Alitalia”), and Mr. Daniele Discepolo, in his capacity as an extraordinary commissioner of Alitalia, requesting this order (the “Order”) pursuant to 11 U.S.C. §§ 1518(1) and 1521(a)(7) to substitute Mr. Discepolo in the place and stead of Dr. Luigi Gubitosi as a foreign representative of Alitalia in this case, with all the powers and authority previously granted to each of the foreign representatives of Alitalia in this case under the *Order Pursuant to 11 U.S.C. §§ 1504, 1515, 1517 and 1520 Recognizing Foreign Representatives and Foreign Main Proceeding* (Docket No. 32) (the “Recognition Order”); this Court having jurisdiction to consider the Application pursuant to 28 U.S.C. §§ 157 and 1334; this being a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(P); venue for this proceeding being proper before this Court pursuant to 28 U.S.C. § 1410; appropriate and timely notice of the filing of the Application been given, and no other or further notice being necessary or required; no objections having been filed, and a certificate of no objection having been filed (Docket No. \_\_); this Court having reviewed the Application along with the exhibit annexed thereto, the attorney

declaration in support of the Application along with the exhibit annexed thereto, and the statements of counsel with respect to the Application at a hearing (the "Hearing"); and this Court having determined, after due deliberation, that the legal and factual bases set forth in the Application establish just cause to grant the relief ordered herein;

**THIS COURT HEREBY FINDS AND DETERMINES THAT:**

1. Daniele Discepolo is a "person" pursuant to 11 U.S.C. § 101(41) and for the purposes of 11 U.S.C. § 1517(a)(2); and
2. Enrico Laghi and Daniele Discepolo are duly appointed foreign representatives of Alitalia within the meaning of 11 U.S.C. § 101(24).

**IT IS HEREBY ORDERED THAT:**

1. Daniele Discepolo is substituted in the place and stead of Luigi Gubitosi as a foreign representative of Alitalia.
2. Daniele Discepolo, along with Enrico Laghi, shall have all the powers and authority granted to each foreign representative of Alitalia as set forth in the Recognition Order.
3. The Court shall retain jurisdiction to hear and to determine all matters arising from or related to implementation of this Order.

New York, New York

Dated: \_\_\_\_\_, 2019

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HONORABLE SEAN H. LANE  
UNITED STATES BANKRUPTCY JUDGE